

**U.S. v. Edward S. Adams**  
**Case No. 17-64 (DWF/KMM)**

**Exhibit K**



Cory E. Manning  
(Admitted in CA & SC)  
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July 26, 2018

**By Electronic Mail**

John Kokkinen  
Assistant United States Attorney  
District of Minnesota, Criminal Division  
600 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415

Re: Ed Adams and Scio Diamond

Dear AUSA Kokkinen:

I write in response to your July 26, 2018 email in which you inquire as to whether my firm has represented the above-referenced parties. My firm had an attorney-client relationship with Scio Diamond, the company. My firm did not have, and has never had, an attorney-client relationship with Mr. Adams in his individual capacity.

Very truly yours,

A handwritten signature in blue ink that reads 'Cory Manning'. Below the signature, the name 'Cory E. Manning' is printed in a standard black font.

Cory E. Manning

CEM:x

**Kokkinen, John (USAMN)**

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**From:** Cory Manning <Cory.Manning@nelsonmullins.com>  
**Sent:** Thursday, July 26, 2018 2:12 PM  
**To:** Kokkinen, John (USAMN)  
**Cc:** Khan, Jennifer L. (MP) (FBI)  
**Subject:** RE: Edward Adams and Scio Diamond  
**Attachments:** 2018.07.26 LTR to Kokkinen.pdf

Please see the attached.

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**From:** Kokkinen, John (USAMN) [mailto:John.Kokkinen@usdoj.gov]  
**Sent:** Thursday, July 26, 2018 12:26 PM  
**To:** Cory Manning <Cory.Manning@nelsonmullins.com>  
**Cc:** Khan, Jennifer L. (MP) (FBI) <jlkhan@fbi.gov>  
**Subject:** Edward Adams and Scio Diamond

Mr. Manning,

I am writing in follow-up of our phone call the other day. As I mentioned on the phone, Edward Adams, whom we are prosecuting in a fraud case, has claimed that emails of his that we obtained in the investigation are privileged because he had a personal attorney-client relationship with your firm. Specifically, he has claimed the below emails are subject to such a privilege claim:

00052950	8/13/2012	Confidential communication from Edward Adams to Joseph Lancia and Cory Manning (Nelson Mullins LLP) copying Charles Nichols and John Jennings for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	Joseph Lancia < <a href="mailto:jlancia@sciodiamond.com">jlancia@sciodiamond.com</a> >; <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	<a href="mailto:CNichols@sciodiamond.com">CNichols@sciodiamond.com</a> < <a href="mailto:CNichols@sciodiamond.com">CNichols@sciodiamond.com</a> >; <a href="mailto:John.Jennings@nelsonmullins.com">John.Jennings@nelsonmullins.com</a> < <a href="mailto:John.Jennings@nelsonmullins.com">John.Jennings@nelsonmullins.com</a> >
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00052955	8/13/2012	Confidential communication from Edward Adams to Joseph Lancia and Cory Manning (Nelson Mullins LLP) copying Charles Nichols and John Jennings, for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >; Joseph Lancia < <a href="mailto:jlancia@sciodiamond.com">jlancia@sciodiamond.com</a> >	<a href="mailto:CNichols@sciodiamond.com">CNichols@sciodiamond.com</a> < <a href="mailto:CNichols@sciodiamond.com">CNichols@sciodiamond.com</a> >; <a href="mailto:John.Jennings@nelsonmullins.com">John.Jennings@nelsonmullins.com</a> < <a href="mailto:John.Jennings@nelsonmullins.com">John.Jennings@nelsonmullins.com</a> >
00052960	8/13/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	
00052965	8/13/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	
00052971	8/13/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	
00052977	8/13/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	
00052992	8/14/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	

		involving certain Apollo investors (Fink litigation).			
00053002	8/14/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	
00053012	8/14/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	
00053020	8/15/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP), and Joe Lancia, for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >; Joseph Lancia < <a href="mailto:jlancia@sciodiamond.com">jlancia@sciodiamond.com</a> >	
00053024	8/15/2012	Confidential communication from Edward Adams to John Jennings (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:John.Jennings@nelsonmullins.com">John.Jennings@nelsonmullins.com</a> < <a href="mailto:John.Jennings@nelsonmullins.com">John.Jennings@nelsonmullins.com</a> >	
00053031	8/15/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) and Joe Lancia, copying Aaron Hartman and Michael Monahan, for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >; Joseph Lancia < <a href="mailto:jlancia@sciodiamond.com">jlancia@sciodiamond.com</a> >	<a href="mailto:AHartman@aoblaw.com">AHartman@aoblaw.com</a> < <a href="mailto:AHartman@aoblaw.com">AHartman@aoblaw.com</a> >; Mich Monahan < <a href="mailto:michaelrmonahan@yahoo.com">michaelrmonahan@yahoo.com</a> >

00053035	8/15/2012	Confidential communication from Edward Adams to Joseph Lancia and Cory Manning (Nelson Mullins LLP), copying Aaron Hartman and Michael Monahan, for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	Joseph Lancia < <a href="mailto:jlancia@sciodiamond.com">jlancia@sciodiamond.com</a> >; <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	<a href="mailto:AHartman@aoblaw.com">AHartman@aoblaw.com</a> < <a href="mailto:AHartman@aoblaw.com">AHartman@aoblaw.com</a> >; Mich Monahan < <a href="mailto:michaelrmonahan@yahoo.com">michaelrmonahan@yahoo.com</a> >
00053050	8/15/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	edwardsadams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	<a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> < <a href="mailto:cory.manning@nelsonmullins.com">cory.manning@nelsonmullins.com</a> >	
00053069	8/16/2012	Confidential communication from Edward Adams to Cory Manning (Nelson Mullins LLP) for the purpose of obtaining legal advice in connection with civil litigation involving certain Apollo investors (Fink litigation).	Edward Adams < <a href="mailto:edwardsadams@yahoo.com">edwardsadams@yahoo.com</a> >	Cory Manning < <a href="mailto:Cory.Manning@nelsonmullins.com">Cory.Manning@nelsonmullins.com</a> >	

Would you please reply to this email to let us know whether you agree with Mr. Adams's assertions that (1) your firm represented him in his personal capacity and (2) the above emails were pursuant to such an attorney-client relationship and are therefore subject to a claim of privilege by Mr. Adams.

Please note that I would intend on attaching your reply to a pleading that will be filed publicly on ECF. If that poses a problem for you, please let me know and we can discuss an alternative arrangement.

Regards,  
John Kokkinen  
Assistant United States Attorney  
District of Minnesota, Criminal Division  
600 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
V: 612.664.5648 | F: 612.664.5787

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